



**NORTHWEST**  
AIR POLLUTION AUTHORITY

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*Serving Island, Skagit and Whatcom Counties*

October 24, 2003

Allen Fiksdal, Manager  
Energy Facility Site Evaluation Council  
P.O. Box 43172  
Olympia, WA 98504-3172

Re: BP Cherry Point Cogeneration Project  
Draft Environmental Impact Statement Comments

Dear Mr. Fiksdal:

The Northwest Air Pollution Authority (NWAPA) is pleased to submit comments on the Draft Environmental Impact Statement dated September 5, 2003 on the BP Cherry Point Cogeneration Project. The NWAPA is a local regulatory authority with responsibility for enforcing the air quality rules and regulations in Whatcom, Skagit and Island Counties within the State of Washington.

The NWAPA has a few concerns about the completeness of the Draft Environmental Impact Statement (DEIS) in regard to Section 3.2 Air Quality. Our comments are as follows:

1. Table 3.2-7 shows the annual potential criteria pollutant emissions. The total for volatile organic carbon (VOC) for the project is listed as 42.3 tons/year. This table references BP 2002 as the source. This source is not listed in the references. 1
2. It is unclear what percentage of the VOC's are hazardous air pollutants (HAPs). The document states that the project is not subject to any Maximum Available Control Technology (MACT) regulations for hazardous air pollutants. We would like to see an expanded discussion with additional pollutant information addressing whether the MACT for combustion turbines (40 CFR 63 Subpart YYYYY) is applicable to this project. 2
3. Toxics Air Pollutant Analysis (Chapter 173-460 WAC) – The discussion and table did not include nitric oxide. This pollutant could be fairly large for this project and has an acceptable source impact level of 100 micrograms per cubic meter twenty-four hour average. This toxic air pollutant should be evaluated in the DEIS. 3

We appreciate the opportunity to comment on the Draft Environmental Impact Statement. Please contact Lynn Billington, Manager of Technical Services, PE at (360) 428-1617 ex. 213 if you need further information or a more detailed explanation of these comments.

Sincerely,

*James Randles*  
James Randles  
Director  
Northwest Air Pollution Authority

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OCT 27 2003

**ENERGY FACILITY SITE  
EVALUATION COUNCIL**